

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Wireless Internet Service Providers Association)	WT Docket 18-353
and Utilities Technology Council Request for)	
Waiver of Citizens Broadband Radio Service)	
Transition Deadline)	

To: Chief, Wireless Telecommunications Bureau

**Comments of Bug Tussel Wireless, LLC, Coleman County Telephone Cooperative, Inc.
and Hill Country Telephone Cooperative, Inc.**

Bug Tussel Wireless, LLC, Coleman County Telephone Cooperative, Inc. and Hill Country Telephone Cooperative, Inc. (the “Rural 3650 Licensees”) submit these brief comments in support of the Wireless Internet Service Providers Association (“WISPA”) and Utilities Technology Council (“UTC”) waiver request of the Citizens Broadband Radio Service (“CBRS”) transition deadline. The Rural 3650 Licensees are 3650 license holders,¹ which, combined, have built and operate 155 registered sites. These sites provide much-needed fixed wireless broadband services to homes in underserved and unserved rural areas. The Rural 3650 Licensees plan to transition these sites to the new CBRS rules once those rules are implemented and once suitable Part 96 equipment is available. However, it is the understanding of the Rural 3650 Licensees that the standards for Part 96 fixed wireless equipment have not been approved. Given this lack of available compliant equipment and in light of the delays finalizing the CBRS rules and implementing Part 96 standards, the Rural 3650 Licensees support the transition extension requested by WISPA and UTC. Such an extension is in the public interest as it will benefit the residents currently served by the Rural 3650 Licensees.

¹ Call Signs WQIB703, WQJC750, WQIT937 and WQOA498.

Accordingly, the Rural 3650 Licensees respectfully request that the Federal Communications Commission grant the WISPA and UTC waiver request.

Respectfully submitted,



By: _____

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December 12, 2018